

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

FAIR ISAAC CORPORATION,

Court File No. 16-cv-1054 (WMW/DTS)

Plaintiff,

v.

FEDERAL INSURANCE COMPANY,  
an Indiana corporation, and ACE  
AMERICAN INSURANCE COMPANY, a  
Pennsylvania corporation,

Defendants.

**DEFENDANTS'  
NINTH SUPPLEMENTAL  
ANSWER TO PLAINTIFF'S  
INTERROGATORY NO. 17**

To: Plaintiff and its attorneys, Allen Hinderaker, Heather Kliebenstein, Michael A. Erbele, and Joseph W. Dubis, Merchant & Gould P.C., 3200 IDS Center, 80 South Eighth Street, Minneapolis, MN 55402.

Defendants Federal Insurance Company and ACE American Insurance Company ("Federal"), for their Ninth Supplemental Answer to Plaintiff's Interrogatory No. 17, state and allege as follows:

**GENERAL RESPONSES**

1. Federal objects to the Definitions and Instructions to the extent that they seek to impose obligations on Federal that either exceed, or are different from, what is required under the Federal Rules of Civil Procedure, District of Minnesota Local Rules, and the Stipulated E-Discovery Order.

2. Federal objects to the requests to the extent that they seek information protected from discovery under the attorney-client privilege or work product doctrine.

3. Federal's responses and objections are made to the best of Federal's present knowledge, information, and belief. Federal's responses and objections are limited to information within its possession, custody, or control. Federal reserves the right to amend, supplement, or

change any responses and objections if and when additional, different, or more accurate information becomes available and/or facts are developed.

4. Federal gives these Responses subject to all objections to admissibility that may be interposed in this proceeding.

#### **NINTH SUPPLEMENTAL ANSWER TO INTERROGATORY NO. 17**

**INTERROGATORY NO. 17:** For all insurance policies in connection with which the Blaze Advisor software was used, the gross written premium of Defendants and the gross written premium of each related company, including the specific identification of each related company, for each quarter from March 30, 2016 to date. For clarity, this Interrogatory is not seeking investment income, other income, or capital and surplus accounts.

**SUPPLEMENTAL ANSWER:** Federal objects to the request for “all” insurance policies as overbroad, unduly burdensome, and not proportional to the needs of this case. Federal also objects to this Interrogatory as compound and impermissibly constituting multiple interrogatories, which are limited in number under the Federal Rules. Federal also objects to this Interrogatory as vague and ambiguous in failing to identify the relevant “use” and calling for insurance policies “in connection with.” Federal further objects to this Interrogatory because “the gross written premium” of Defendants and the “gross written premium of each related company” are not relevant to any claim or defense in this action, including because FICO has not presented any evidence of a non-speculative connection between Federal’s profits and the alleged infringement, as is necessary for FICO to obtain an award of the defendants’ profits under 17 U.S.C. § 504(b). (*See, e.g.*, Dkt. 380 at 6-8; Dkt. 445 at 28-34; Dkt. 567 at 5-7.) Federal further objects to the extent the Interrogatory seeks information not in the possession, custody, or control of Federal, and thus exceeds the scope of discovery under Federal Rule 26(b)(1).

Subject to, and without waiving these objections, Federal states the following:

- For the Financial Lines Unit (post-merger) for the years identified below, the following applications used Blaze Advisor® software: CSI Express, Decision Point, Automated Renewal Process, Profitability Indicator, and Defined Book Run. The approximate gross

written premiums, policy counts, and identification of the insurance writing companies that issued insurance policies that used these applications, in connection with which the Blaze Advisor software was used, is provided in the charts below for the years requested.

- **For Decision Point (DP):**

<b>Year / Writing Company</b>	<b>Gross Written Premium</b>	<b>Policy Count</b>
<b>2020</b>	<b>\$1,631,043.00</b>	<b>582</b>
CICNJ	\$61,931.00	18
ERII	\$4,555.00	1
FIC-D	\$1,564,557.00	563
<b>2019</b>	<b>\$5,870,061.48</b>	<b>2082</b>
CICNJ	\$357,809.00	85
ERII	\$23,067	3
FIC-D	\$5,489,185.48	1994
<b>2018</b>	<b>\$4,814,337.77</b>	<b>1697.00</b>
CICNJ	\$236,749.00	71.00
ERII	\$34,899.00	5.00
FIC-D	\$4,542,689.77	1621.00
<b>2017</b>	<b>\$4,319,855.92</b>	<b>1447.00</b>
CICNJ	\$319,436.68	82.00
ERII	\$34,636.00	3.00
FIC-D	\$3,965,783.24	1362.00
<b>2016</b>	<b>\$3,547,608.80</b>	<b>1162.00</b>
CICNJ	\$182,249.80	43.00
ERII	\$5,465.00	1.00
FIC-D	\$3,359,894.00	1118.00

- The Blaze Advisor component was removed from the version of Decision Point used by the Financial Lines Unit on or about April 10, 2020.
- **For CSI eXPRESS (CSIX), Automated Renewal Process (ARP), Profitability Indicator (PI), and Defined Book Run (DBR):**

<b>Year / Writing Company</b>	<b>Gross Written Premium</b>	<b>Policy Count</b>
<b>2016</b>	<b>\$1,526,511,534.36</b>	<b>90555</b>
<b>CSIX/ARP/PI</b>	<b>\$1,444,514,455.23</b>	<b>82191</b>
CICNJ	\$21,543,942.90	1893
ERII	\$74,655,072.17	5326
ERSIC	\$31,403,417.00	1466
FIC-D	\$1,210,424,578.61	68552
PACIFICPI	\$150,747.00	64
VIG-D	\$7,425,581.00	98
CICC-CN	\$98,911,116.55	4792
<b>New Business PI excluding DP</b>	<b>\$81,997,079.13</b>	<b>8364</b>
CICNJ	\$2,212,095.00	268

<b>Year / Writing Company</b>	<b>Gross Written Premium</b>	<b>Policy Count</b>
ERII	\$492,570.48	52
ERSIC	\$1,026,440.46	72
FIC-D	\$75,579,124.19	7694
PACIFICPI	\$206,637.00	34
CICC-CN	\$2,480,212.00	244
<b>2017</b>	<b>\$1,462,910,856.49</b>	<b>91631</b>
<b>CSIX/ARP/PI</b>	<b>\$1,351,871,992.43</b>	<b>82188</b>
CICNJ	\$20,940,256.13	1999
ERII	\$62,459,326.84	4808
ERSIC	\$28,856,329.46	1389
FIC-D	\$1,132,709,567.53	69042
PACIFICPI	\$331,853.03	86
VIG-D	\$6,697,327.00	71
CICC-CN	\$99,877,332.44	4793
<b>New Business PI excluding DP</b>	<b>\$111,038,864.06</b>	<b>9443</b>
CICNJ	\$2,916,920.00	250
ERII	\$441,480.80	23
ERSIC	\$1,256,712.58	93
FIC-D	\$101,305,050.77	8483
PACIFICPI	\$262,033.00	44
VIG-D	\$3,346.00	1
CICC-CN	\$4,853,320.91	549
<b>2018</b>	<b>\$1,406,041,567.67</b>	<b>93653</b>
<b>CSIX/ARP/PI</b>	<b>\$1,268,911,770.98</b>	<b>82523</b>
CCIC	\$3,309,818.00	195
CICNJ	\$22,833,376.00	2098
ERII	\$49,158,127.00	4254
ERSIC	\$11,370,649.00	797
FIC-D	\$1,084,053,466.78	70090
PACIFICPI	\$384,509.00	55
VIG-D	\$5,071,070.00	53
CICC-CN	\$92,730,755.20	4981
<b>New Business PI excluding DP</b>	<b>\$137,129,796.69</b>	<b>11130</b>
CCIC	\$1,210,985.00	46
CICNJ	\$3,180,349.00	376
ERII	\$10,429.00	4
ERSIC	\$1,377,654.00	100
FIC-D	\$126,368,941.69	10050
PACIFICPI	\$101,678.00	21
CICC-CN	\$4,879,760.00	533
<b>2019</b>	<b>\$1,427,189,814.44</b>	<b>94528</b>
<b>CSIX/ARP/PI</b>	<b>\$1,283,423,271.03</b>	<b>83501</b>
CCIC	\$12,910,102.00	793
CICNJ	\$24,847,861.00	2227

Year / Writing Company	Gross Written Premium	Policy Count
ERII	\$39,894,505.00	3485
FIC-D	\$1,110,317,333.03	71862
PACIFICPI	\$359,714.00	56
VIG-D	\$3,071,878.00	41
CICC-CN	\$92,021,878.00	5037
<b>New Business PI excluding DP</b>	<b>\$143,766,543.41</b>	<b>11027</b>
CCIC	\$1,231,538.00	103
CICNJ	\$3,382,816.29	337
ERII	\$23,920.00	3
FIC-D	\$135,056,689.12	10158
PACIFICPI	\$171,583.00	9
VIG-D	\$34,866.00	3
CICC-CN	\$3,865,131.00	414
<b>2020</b>	<b>\$137,268,314.00</b>	<b>15781</b>
<b>CSIX/ARP/PI</b>	<b>\$128,756,002.00</b>	<b>15170</b>
CCIC	\$1,270,989.00	105
CICNJ	\$2,595,663.00	342
ERII	\$4,529,483.00	575
FIC-D	\$114,743,527.00	13476
PACIFICPI	\$ 47,603.00	10
VIG-D	\$159,503.00	8
CICC-CN	\$5,409,234.00	654
<b>New Business PI excluding DP</b>	<b>\$8,512,312.00</b>	<b>611</b>
CCIC	\$191,378.00	9
CICNJ	\$653,482.00	29
FIC-D	\$7,625,948.00	566
CICC-CN	\$41,504.00	7

- CSI eXPRESS, Automated Renewal Process, and Profitability Indicator are combined all together in one chart because creating a separate chart for each application would result in triple-counting of the policy counts and gross written premiums. In other words, policies and premiums that go through one of these applications goes through the other two applications as well. The Blaze Advisor component was removed from the version of CSI eXPRESS, Automated Renewal Process, and Profitability Indicator used by the Financial Lines Unit on or about January 17, 2020.
- Defined Book Run, a process within CSI eXPRESS, is used to generate profitability analyses for informational purposes. The DBR process has been used on policies that do not reside within CSI eXPRESS and are not included in the premium and writing company information above. For these policies outside CSI eXPRESS, the writing company names are not captured, and the premiums actually charged are not required to be and were generally not specified, and therefore, are generally not available.

- For Corporate Business Systems (CBS), which is not a strategic business unit (SBU), the following application uses Blaze Advisor software: Premium Booking. The approximate gross written premiums and policy counts that used these applications, in connection with which the Blaze Advisor software was used, is provided in the charts below for the years requested. Discovery is continuing.

Year	Gross Written Premium	Policy Count
2019	\$426,769,796.93	344,101
2018	\$500,850,828.90	57,023
2017	\$442,839,931.87	60,142
2016	\$503,432,073.43	57,219

- The data for Premium Booking is extracted from a mainframe DB2 table that is specifically tracking the policies that passed through the Premium Booking “rules” as constructed in/using the Blaze Advisor tool. This table does not include writing company and that information could not be correlated to the policy count/gross written premium values being provided.
- The Blaze Advisor component was removed from the version of Premium Booking used by Corporate Business Systems on or about April 17, 2020.
- For the Chubb Commercial Insurance (CCI) business unit for the years identified below (post-merger), the following applications use Blaze Advisor software: CUW-IM, TAPS, and IRMA. The approximate gross written premiums, policy counts, and identification of the insurance writing companies that issued insurance policies that used these applications, in connection with which the Blaze Advisor software was used, is provided in the charts below for the years requested. Discovery is continuing.

- For CUW-IM:<sup>1</sup>**

YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
2016	CHUBB CUSTOM INSURANCE COMPANY	2,139	\$78,726,313.00
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	8	\$15,358.00
	CHUBB EUROPEAN GROUP SE	44	\$154,603.00
	CHUBB INDEMNITY INSURANCE COMPANY	4,550	\$238,730,739.00
	CHUBB INSURANCE AUSTRALIA LIMITED	6	\$58,977.00
	CHUBB INSURANCE COMPANY LIMITED	4	\$52,541.00
	CHUBB INSURANCE COMPANY OF CANADA	6	\$125,228.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	3,792	\$44,501,973.00
	CHUBB NATIONAL INSURANCE COMPANY	1,268	\$29,181,294.00
	CHUBB SEGUROS BRASIL, S.A.	2	\$27,605.00

<sup>1</sup> This financial information includes policies that were brought in under a system that includes policies that are renewed using Blaze, but automatically at the same time includes the prior transaction involving the same policy regardless whether it uses Blaze. Federal has used reasonable efforts to *not* include the prior policy since it results in the financial information having inflated numbers.



YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
	EXECUTIVE RISK INDEMNITY INC.	13	\$2,534,222.00
	EXECUTIVE RISK SPECIALTY INSURANCE COMPANY	29	\$1,821,133.00
	FEDERAL INSURANCE COMPANY	146,689	\$2,567,477,880.00
	GREAT NORTHERN INSURANCE COMPANY	31,416	\$492,561,623.00
	PACIFIC INDEMNITY COMPANY	4,692	\$198,358,535.00
	VIGILANT INSURANCE COMPANY	6,647	\$164,280,405.00
	ACE AMERICAN INSURANCE CO	2,890	\$108,983,074.00
	ACE FIRE UNDERWRITERS INS	38	\$1,092,991.00
	ACE PROPERTY AND CASUALTY	768	\$106,304,730.00
	ILLINOIS UNION INSURANCE	1,183	\$81,709,115.00
	INDEMNITY INSURANCE CO OF	97	\$17,014,247.06
	PACIFIC EMPLOYERS INSURAN	6	\$469,700.00
	WESTCHESTER SURPLUS LINES	132	\$12,587,416.00
	WESTCHESTER FIRE INSURANCE COMPANY	1,010	\$31,266,954.00
2017	CHUBB CUSTOM INSURANCE COMPANY	1,138	\$23,609,062.00
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	2	\$16,435.00
	CHUBB EUROPEAN GROUP SE	48	\$62,376.00
	CHUBB INDEMNITY INSURANCE COMPANY	6,269	\$182,692,863.00
	CHUBB INSURANCE AUSTRALIA LIMITED	3	\$0.00
	CHUBB INSURANCE COMPANY LIMITED	3	\$6,136.00
	CHUBB INSURANCE COMPANY OF CANADA	2	\$6,754.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	3,590	\$20,305,777.00
	CHUBB NATIONAL INSURANCE COMPANY	1,970	\$29,482,878.00
	CHUBB SEGUROS BRASIL, S.A.	2	\$643.00
	EXECUTIVE RISK INDEMNITY INC.	12	\$185,443.00
	EXECUTIVE RISK SPECIALTY INSURANCE COMPANY	11	\$117,904.00
	FEDERAL INSURANCE COMPANY	155,496	\$1,637,912,514.00
	GREAT NORTHERN INSURANCE COMPANY	32,597	\$361,198,461.00
	PACIFIC INDEMNITY COMPANY	4,930	\$164,186,063.00
	VIGILANT INSURANCE COMPANY	6,629	\$106,322,827.00
	ACE AMERICAN INSURANCE CO	8,243	\$354,885,927.00
	ACE FIRE UNDERWRITERS INS	53	\$1,722,590.00
	ACE PROPERTY AND CASUALTY	2,413	\$248,919,844.00
	ILLINOIS UNION INSURANCE	3,444	\$255,341,641.00
	INDEMNITY INSURANCE CO OF	281	\$21,351,439.00
	PACIFIC EMPLOYERS INSURAN	21	\$869,381.00
	WESTCHESTER SURPLUS LINES	476	\$45,285,709.00
	WESTCHESTER FIRE INSURANCE COMPANY	2,246	\$67,191,783.00
2018	CHUBB CUSTOM INSURANCE COMPANY	731	\$22,013,565.00
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	3	\$0.00
	CHUBB EUROPEAN GROUP SE	26	\$0.00
	CHUBB INDEMNITY INSURANCE COMPANY	6,400	\$128,841,814.00
	CHUBB INSURANCE AUSTRALIA LIMITED	1	\$0.00
	CHUBB INSURANCE COMPANY LIMITED	1	\$0.00



YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
	CHUBB INSURANCE COMPANY OF CANADA	1	\$0.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	3,420	\$20,310,216.00
	CHUBB NATIONAL INSURANCE COMPANY	2,027	\$28,061,704.00
	CHUBB SEGUROS BRASIL, S.A.	2	\$0.00
	EXECUTIVE RISK INDEMNITY INC.	8	\$1,661,561.00
	EXECUTIVE RISK SPECIALTY INSURANCE COMPANY	3	\$2,928.00
	FEDERAL INSURANCE COMPANY	145,259	\$1,404,328,456.00
	GREAT NORTHERN INSURANCE COMPANY	31,212	\$343,254,047.00
	PACIFIC INDEMNITY COMPANY	4,488	\$116,800,656.00
	VIGILANT INSURANCE COMPANY	5,996	\$83,645,205.00
	ACE AMERICAN INSURANCE CO	6,740	\$274,751,661.00
	ACE FIRE UNDERWRITERS INS	38	\$1,498,240.00
	ACE PROPERTY AND CASUALTY	1,971	\$191,070,156.00
	ILLINOIS UNION INSURANCE	3,372	\$240,820,970.00
	INDEMNITY INSURANCE CO OF	175	\$13,196,308.00
	PACIFIC EMPLOYERS INSURAN	14	\$51,084.00
	WESTCHESTER SURPLUS LINES	602	\$49,388,448.00
	WESTCHESTER FIRE INSURANCE COMPANY	1,273	\$36,242,321.00
2019	BANKERS STANDARD INSURANCE COMPANY	12	\$1,155,451.00
	CHUBB CUSTOM INSURANCE COMPANY	300	\$26,686,556.00
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	0	\$0.00
	CHUBB EUROPEAN GROUP SE	0	\$0.00
	CHUBB INDEMNITY INSURANCE COMPANY	2,145	\$116,078,768.00
	CHUBB INSURANCE AUSTRALIA LIMITED	0	\$0.00
	CHUBB INSURANCE COMPANY LIMITED	0	\$0.00
	CHUBB INSURANCE COMPANY OF CANADA	0	\$0.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	1,779	\$21,523,091.00
	CHUBB NATIONAL INSURANCE COMPANY	1,047	\$35,216,014.00
	CHUBB SEGUROS BRASIL, S.A.	0	\$0.00
	EXECUTIVE RISK INDEMNITY INC.	100	\$5,404,511.00
	EXECUTIVE RISK SPECIALTY INSURANCE COMPANY	1	\$2,928.00
	FEDERAL INSURANCE COMPANY	74,792	\$1,541,359,386.00
	GREAT NORTHERN INSURANCE COMPANY	16,003	\$406,873,922.00
	PACIFIC INDEMNITY COMPANY	2,075	\$101,793,938.00
	VIGILANT INSURANCE COMPANY	3,019	\$111,400,555.00
	ACE AMERICAN INSURANCE CO	10,025	\$421,279,223.00
	ACE FIRE UNDERWRITERS INS	58	\$1,963,803.00
	ACE PROPERTY AND CASUALTY	2,787	\$337,956,699.00
	ILLINOIS UNION INSURANCE	4,560	\$421,234,166.00
	INDEMNITY INSURANCE CO OF	340	\$27,030,784.00
	PACIFIC EMPLOYERS INSURAN	32	\$736,532.00
	WESTCHESTER SURPLUS LINES	879	\$93,856,583.00
	WESTCHESTER FIRE INSURANCE COMPANY	2,587	\$107,190,473.00

- The Blaze Advisor component was removed from the version of CUW-IM used by the Chubb Commercial Insurance (CCI) business unit in early November 2019.

- **For TAPS:**

YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
2016	CHUBB INDEMNITY INSURANCE COMPANY	207	\$73,264,108.51
	CHUBB NATIONAL INSURANCE COMPANY	7	\$561,041.00
	FEDERAL INSURANCE COMPANY	536	\$143,625,269.12
	GREAT NORTHERN INSURANCE COMPANY	20	\$8,309,789.00
	PACIFIC INDEMNITY COMPANY	79	\$42,217,709.72
	VIGILANT INSURANCE COMPANY	47	\$17,102,989.00
2017	CHUBB INDEMNITY INSURANCE COMPANY	239	\$45,571,577.11
	CHUBB NATIONAL INSURANCE COMPANY	10	\$1,864,828.00
	FEDERAL INSURANCE COMPANY	496	\$144,179,731.68
	GREAT NORTHERN INSURANCE COMPANY	14	\$5,976,054.00
	PACIFIC INDEMNITY COMPANY	88	\$45,768,062.54
	VIGILANT INSURANCE COMPANY	34	\$8,858,947.00
2018	CHUBB INDEMNITY INSURANCE COMPANY	248	\$39,388,714.07
	CHUBB NATIONAL INSURANCE COMPANY	23	\$5,073,844.00
	FEDERAL INSURANCE COMPANY	484	\$123,103,492.27
	GREAT NORTHERN INSURANCE COMPANY	18	\$5,192,985.00
	PACIFIC INDEMNITY COMPANY	78	\$37,960,159.00
	VIGILANT INSURANCE COMPANY	19	\$5,771,749.00
2019	CHUBB INDEMNITY INSURANCE COMPANY	135	\$36,199,611.00
	CHUBB NATIONAL INSURANCE COMPANY	40	\$2,431,048.00
	EXECUTIVE RISK INDEMNITY INC.	29	\$17,004.00
	FEDERAL INSURANCE COMPANY	363	\$86,991,815.49
	GREAT NORTHERN INSURANCE COMPANY	8	\$2,819,686.00
	PACIFIC INDEMNITY COMPANY	58	\$26,821,891.00
	VIGILANT INSURANCE COMPANY	19	\$4,911,863.00

- The Blaze Advisor component was removed from the version of TAPS used by the Chubb Commercial Insurance (CCI) business unit in late-third quarter or early-fourth quarter in 2019.

- **For IRMA:**

YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
2016	ALBANY INSURANCE COMPANY	1	\$7,252.00
	CHUBB CUSTOM INSURANCE COMPANY	92	\$615,040.00
	CHUBB DE MEXICO	2	\$19,419.68
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	4	\$5,451.43
	CHUBB INSURANCE AUSTRALIA LIMITED	7	\$33,636.74
	CHUBB INSURANCE COMPANY LIMITED	6	\$3,758.22
	CHUBB INSURANCE COMPANY OF CANADA	1815	\$10,045,178.53
	CHUBB INSURANCE COMPANY OF NEW JERSEY	253	\$1,108,829.00

YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
	FEDERAL INSURANCE COMPANY	11876	\$68,744,410.52
	GREAT NORTHERN INSURANCE COMPANY	3839	\$17,031,473.49
	PACIFIC INDEMNITY COMPANY	459	\$3,894,125.04
	SELF-INSURED RETENTION	1	\$750.00
	VIGILANT INSURANCE COMPANY	714	\$3,757,327.16
2017	CHUBB CUSTOM INSURANCE COMPANY	6	\$13,803.00
	CHUBB DE MEXICO	1	\$7,175.34
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	2	\$4,582.26
	CHUBB EUROPEAN GROUP SE	1	\$32,575.09
	CHUBB INSURANCE AUSTRALIA LIMITED	2	\$10,500.40
	CHUBB INSURANCE COMPANY LIMITED	4	\$15,067.52
	CHUBB INSURANCE COMPANY OF CANADA	1863	\$10,196,153.18
	CHUBB INSURANCE COMPANY OF NEW JERSEY	248	\$889,740.00
	FEDERAL INSURANCE COMPANY	11534	\$66,294,342.58
	GREAT NORTHERN INSURANCE COMPANY	3723	\$16,015,552.22
	PACIFIC INDEMNITY COMPANY	420	\$2,860,462.66
	VIGILANT INSURANCE COMPANY	684	\$3,348,817.42
2018	CHUBB CUSTOM INSURANCE COMPANY	2	\$4,782.00
	CHUBB INSURANCE COMPANY OF CANADA	1831	\$11,668,247.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	217	\$966,870.00
	FEDERAL INSURANCE COMPANY	10318	\$59,180,523.71
	GREAT NORTHERN INSURANCE COMPANY	3444	\$15,149,787.68
	PACIFIC INDEMNITY COMPANY	388	\$2,586,049.98
	VIGILANT INSURANCE COMPANY	644	\$3,085,724.04
2019	CHUBB INSURANCE COMPANY OF CANADA	241	\$4,104,241.34
	CHUBB INSURANCE COMPANY OF NEW JERSEY	122	\$728,557.00
	FEDERAL INSURANCE COMPANY	7099	\$45,985,294.89
	GREAT NORTHERN INSURANCE COMPANY	2434	\$10,741,052.59
	PACIFIC INDEMNITY COMPANY	280	\$1,895,169.55
	VIGILANT INSURANCE COMPANY	457	\$1,572,790.83

- The Blaze Advisor component was removed from the version of IRMA used by the Chubb Commercial Insurance (CCI) business unit in either the summer or early fall of 2019.
- ERCIS Claims is a claims system (not a policy system), and therefore, there is no gross written premium or policy count associated with the application.
- For the Surety business unit for the years identified below (post-merger), the following application does not use Blaze Advisor software: Cornerstone. However, as ordered by the Court, below are the approximate gross written premiums, policy counts, and identification of the insurance writing company that issued insurance policies that used Cornerstone:

Year/Writing Company	Policy Count	Gross Written Premium
<b>2016</b>	<b>324291</b>	<b>\$237,436,826</b>
Chubb Ins Co of Canada	13961	\$7,408,108

<b>Year/Writing Company</b>	<b>Policy Count</b>	<b>Gross Written Premium</b>
Federal Ins Co - Canada	10	\$0
Federal Insurance Co	285113	\$220,608,093
Great Northern Insurance Co	18	\$0
Pacific Indemnity Co	7427	\$5,000,954
Vigilant Insurance Co	17762	\$4,419,671
<b>2017</b>	<b>318828</b>	<b>\$259,641,111</b>
Chubb Ins Co of Canada	13966	\$11,328,070
Federal Insurance Co	280763	\$235,297,734
Great Northern Insurance Co	20	\$670
Pacific Indemnity Co	7309	\$9,784,435
Vigilant Insurance Co	16770	\$3,230,203
<b>2018</b>	<b>303229</b>	<b>\$137,058,165</b>
Chubb Ins Co of Canada	21276	\$14,657,186
Federal Insurance Co	261448	\$116,145,727
Great Northern Insurance Co	37	\$1,205
Pacific Indemnity Co	6540	\$4,497,351
Vigilant Insurance Co	13928	\$1,756,697
<b>2019</b>	<b>88360</b>	<b>\$-6,469</b>
Federal Insurance Co	82075	\$-6,469
Great Northern Insurance Co	11	0
Pacific Indemnity Co	1601	0
Vigilant Insurance Co	4673	0
<b>2020</b>	<b>8002</b>	<b>0</b>
Federal Insurance Co.	7323	0
Pacific Indemnity Co.	112	0
Vigilant Insurance Co.	567	0

Dated: September 24, 2020

/s/ Terrence J. Fleming

Terrence J. Fleming (#0128983)

[tfleming@fredlaw.com](mailto:tfleming@fredlaw.com)

Leah Janus (#0337365)

[ljanus@fredlaw.com](mailto:ljanus@fredlaw.com)

Christopher D. Pham (#0390165)

[cpham@fredlaw.com](mailto:cpham@fredlaw.com)

Christian V. Hokans (#0400377)

[chokans@fredlaw.com](mailto:chokans@fredlaw.com)

**FREDRIKSON & BYRON, P.A.**

200 South Sixth Street, Suite 4000

Minneapolis, MN 55402-1425


(612) 492-7000 (tel.)

(612) 492-7077 (fax)

*Attorneys for Federal Insurance Company and  
ACE American Insurance Company*

**VERIFICATION**

C. Chase McCarthy states under oath that he is IT Lead, North America Commercial Middle Market/Chief Architect, Personal Risk Services; that he is authorized to respond to Plaintiff's Interrogatory No. 17 on behalf of Federal Insurance Company as it relates to the Chubb Commercial Insurance (CCI) business unit; that he has relied on directors, employees, agents, and attorneys to provide information used in formulating the answer to the above interrogatory; and that the answer is true and correct to the best of his knowledge.

  
C. Chase McCarthy

Subscribed and sworn to before me  
this 28 day of September, 2020.

  
Notary Public



